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From: Peters, Douglas (CTED)

Posted At: Wednesday, April 19, 2006 3:43 PM

Posted To: Western Comments

Conversation: Phase 2 Western Washington stormwater NPDES permits

Subject: Phase 2 Western Washington stormwater NPDES permits

Condition S-1 A. 2. of this draft permit specifies that coverage extends to all urban areas and urbanizing areas in Urban Growth Areas (UGAs) "associated with cities". The Growth Management Act provides that counties may designate some UGAs as non-municipal UGAs (not associated with any city), and may or may not be associated with services provided by a nearby city. We recommend this language be changed to reflect this fact and we suggest language such as:

2. For all counties required to obtain coverage under this Permit, the requirements of this Permit are applicable and shall be implemented throughout the urbanized areas of both municipal and non-municipal urban growth areas within the urbanized areas which are under the jurisdictional control of the county.

Thanks for the opportunity to comment on the draft NPDES Phase 2 stormwater permit.

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